

REMARKS

Claims 1-39 are all the claims pending in the application, with claims 1, 31, and 39 being the only independent claims.

Applicant notes with appreciation that the originally filed drawings have been accepted, and that the IDS papers have been signed and acknowledged by the Examiner.

Claims 31-38 stand rejected under 35 U.S.C. §101 as being directed toward non-statutory subject matter. Claims 1-9, 18-23, 31-34, and 39 stand rejected under 35 U.S.C. §102(b) as being anticipated by Baudel et al. (U.S. 5,666,499). Claims 10-17 and 24-31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Baudel in view of one or more additional references referred to on pages 8-16 of the Office Action. Applicant respectfully traverses these rejections, and requests reconsideration and allowance of the pending claims in view of the following arguments.

Substance of Interview

As a preliminary matter, Applicant gratefully acknowledges the courtesies extended by the Examiner in the July 3, 2007, telephone interview with Applicant's representative, Jeffrey Lotspeich. The Examiner's comments and explanations were helpful and very much appreciated. Pursuant to M.P.E.P. § 713.04, Applicant provides the following remarks.

The rejection under 35 U.S.C. § 101 with regard to independent claim 31 was discussed. The Examiner suggested alternative wording for this claim which would overcome the stated rejections. Applicant thanks the Examiner for his suggestion and has amended claim 31 consistent with the suggested wording.

Rejection under 35 U.S.C. §101

Claims 31-38 stand rejected under 35 U.S.C. §101 as being directed toward non-statutory subject matter. As noted above, claim 31 has been amended to include language suggested by the Examiner during the interview. Support for this amendment may be found at, for example, page 17, lines 17-21 of the originally filed specification. Applicant submits that the rejected claims are now consistent with the requirements of 35 U.S.C. § 101, and respectfully requests withdrawal of this rejection.

Rejection under 35 U.S.C. §102(b) as being anticipated by Baudel

Claims 1-9, 18-23, 31-34, and 39 stand rejected under 35 U.S.C. §102(b) as being anticipated by Baudel.

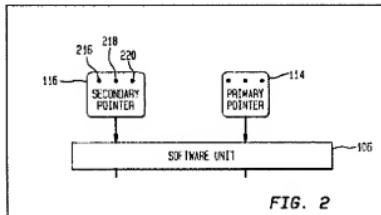
Claim 1 is directed toward a method for facilitating computer editing of an electronic document, and includes “positioning a first cursor at a first location within said electronic document responsive to user input from a user interface device,” and “positioning a second cursor at a second location within said electronic document responsive to user input from said user interface device.” Applicant emphasizes that both claimed positioning operations are responsive to the same device; namely the “user interface device.”

Using Baudel, page 3 of the Office Action equates primary cursor 402 with the claimed “first cursor” and secondary cursor 410 with the claimed “second cursor.” Portions of Baudel which relate to these cursors are as follows:

“Fig. 4(a) illustrates a main application area 400 with only data and a primary cursor 402 (i.e., cursor controlled by primary pointer device 114) being shown on the display of graphics terminal 118.” (Col. 5, lines 42-45).

"A secondary cursor 410 (i.e., cursor controlled by secondary pointer device 116) is displayed on tool palette 406 highlighting a selected tool. (Col. 5, lines 50-53).

The above noted portions clarify that Baudel requires two distinction devices (i.e., devices 114, 116) for controlling two cursors (cursor 402, 410). This shortcoming of Baudel is further emphasized in Fig. 2 of this reference, the relevant portions of which are depicted below.



Applicant assumes *arguendo* that primary pointer 114 is capable of positioning a first cursor and that secondary pointer 116 is capable of positioning a second cursor. Even if this were correct, Baudel at best discloses a system in which two different devices (i.e., devices 114, 116) are used for positioning two cursors (cursors 402, 410). Claim 1 is distinguishable since this claim requires positioning of the first and second cursor responsive to user input from the same device; namely, the user interface device.

In view of the foregoing, Baudel fails to teach or suggest the identified features recited in claim 1, and therefore this claim is believed to be patentable. Independent claim 39 includes language similar to that of claim 1, and thus, is believed to be patentable for reasons similar to those discussed with regard to claim 1. Dependent claims 2-8, 18-23, 31-34 are believed to be patentable at least by virtue of their dependence on patentable claim 1.

**Rejection Under 35 U.S.C. §103(a)
as being unpatentable over Baudel**

Claims 10-17 and 24-31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Baudel in view of one or additional references referred to on pages 8-16 of the Office Action.

Applicant has demonstrated above that Baudel does not teach or suggest various features recited in claims 1 and 31. Applicant further submits that none of the cited references supply any of the deficiencies of Baudel. Therefore, for the reasons presented above, even if one skilled in the art were to combine the teachings of the asserted references in the manner alleged, claim 31 would be patentable since all of the claim elements are not taught, and claims 10-17 would be patentable at least by virtue of their dependency upon patentable independent claim 1.

CONCLUSION

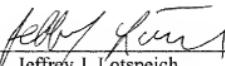
In light of the above remarks, Applicant submits that the present Amendment places all claims of the present application in condition for allowance. Reconsideration of the application is requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California, telephone number (213) 623-2221 to discuss the steps necessary for placing the application in condition for allowance.

Respectfully submitted,
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